

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

ROBERT GARDNER,

Plaintiff,

v

LANSING COMMUNITY COLLEGE and
THE MICHIGAN EDUCATION
ASSOCIATION, JULIE PETRY, and
BEVERLY BALIGAD,

Defendant.

Case No. 1:10-cv-326

Hon. Robert J. Jonker

Mag. Judge Hugh W. Brenneman, Jr.

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DEFENDANTS' MOTION TO COMPEL DISCOVERY

Defendants Lansing Community College, Julie Petry, and Beverly Baligad, through their attorneys, Foster Swift Collins & Smith PC, move pursuant to Fed. R. Civ. P. 37(a)(1)-(3) for an order compelling Plaintiff Robert Gardner to provide responses to Defendants' First Set of Interrogatories and Request for Production of Documents.

Consistent with Local Rule 7.1(d), Defendants requested, but did not obtain, concurrence in the relief sought. The undersigned telephoned Plaintiff's counsel on August 4, 2011,

explaining the nature of this motion and attempting to obtain concurrence in a detailed voicemail. No response has been received.

Respectfully submitted,

FOSTER SWIFT COLLINS & SMITH PC
Attorneys for Defendants

Dated: August 8, 2011

By: /s/ Scott L. Mandel
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CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2011, I electronically filed the foregoing Motion to Compel Discovery with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record.

/s/ Scott L. Mandel
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